

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In re: _____) Chapter 11
)
)
MERCY HOSPITAL, IOWA CITY,) Case No. 23-00623 (TJC)
IOWA, *et al.*)
)
) (Jointly Administered)
Debtors. _____)

MOTION FOR ADMISSION PRO HAC VICE

Jake William Gordon, of the law firm of Foley & Lardner LLP, 500 Woodward Avenue, Suite 2700, Detroit, MI 48226, an attorney who is not a member of the bar of this district, hereby moves to appear *pro hac vice* in the above-referenced case on behalf of Mercy Health Network, Inc. d/b/a MercyOne (“MercyOne”). In support of this Motion, Mr. Gordon states as follows:

1. My contact information is as follows:

Jake William Gordon
FOLEY & LARDNER LLP
500 Woodward Avenue, Suite 2700
Detroit, MI 48226
Tel: (313) 234-7100
Email: jake.gordon@foley.com

2. I am a member in good standing of the Bar of the State of Illinois and was admitted on August 22, 2017. I am also a member in good standing of the Bar of the State of Michigan and was admitted on August 15, 2022. A letter or certificate of good standing will be filed within 21 days of this Motion, as required by Local Rule 2090-1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Iowa.

3. I have been admitted to practice, am in good standing, and eligible to practice in the following courts and admitted on the following dates:

- a. U.S. District Court for the Northern District of Illinois (January 4, 2022).

b. U.S. District Court for the Eastern District of Michigan (November 8, 2022).

4. I am currently not suspended or disbarred in any court. To my knowledge, no disciplinary proceedings have ever been filed or are pending against me.

5. I have not concurrently or within the year preceding this application, made any *pro hac vice* application to this Court.

6. I hereby acknowledge that if this Motion is granted, I am subject to the jurisdiction of the Court with respect to the attorney's conduct to the same extent as a member of this Court's bar is subject to the Iowa Rules of Professional Conduct. I further acknowledge that if this Motion is granted, I am required to request filing privileges with the Northern District of Iowa Bankruptcy Court via PACER and that I shall file a Notice of Appearance and Request for Notice under my own PACER login to ensure electronic noticing will occur.

7. I will comply with the associate counsel requirements of Local Rule 2090-1 by associating with Michael R. Reck and Matthew T. Cronin, attorneys who have been admitted to the bar of this Court and District and who have entered appearances in this case on behalf of MercyOne.

I further declare under penalty of perjury that the foregoing statements are true and correct.

Dated: Chicago, Illinois

March 25, 2024

Respectfully submitted,

/s/ Jake William Gordon
Jake William Gordon
FOLEY & LARDNER LLP
500 Woodward Avenue, Suite 2700
Detroit, MI 48226
Tel: (313) 234-7100 / Fax: (313) 234-2800
jake.gordon@foley.com

/s/ Matthew T. Cronin

BELIN McCORMICK, P.C.
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309
Tel: (515) 243-7100 / Fax: (515) 558-0704
mtcronin@belinmccormick.com

*Attorneys for Mercy Health Network, Inc.
d/b/a MercyOne*